

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	
INTEGRATED HEALTH SERVICES, INC.,)	Case No. 00-389 (MFW)
<i>et al.</i> ,)	Jointly Administered
Debtors.)	
<hr/>		
IHS LIQUIDATING LLC,)	
)	
Plaintiff,)	
v.)	Civil Action No. 05-376 (GMS)
)	
ACE INDEMNITY INSURANCE COMPANY)	
f/k/a INDEMNITY INSURANCE COMPANY)	
OF NORTH AMERICA,)	
)	
Defendant.)	
<hr/>		
IHS LIQUIDATING LLC,)	Civil Action No. 04-1262 (GMS)
)	
Third Party Plaintiff,)	
v.)	
)	
NATIONAL UNION FIRE INSURANCE)	
COMPANY OF PITTSBURGH, PA,)	
GENERAL STAR INDEMNITY COMPANY)	
and ACE INDEMNITY INSURANCE)	
COMPANY f/k/a INDEMNITY INSURANCE)	
COMPANY OF NORTH AMERICA)	
)	
Third-Party Defendants.)	
<hr/>		
ACE INDEMNITY INSURANCE COMPANY)	
f/k/a INDEMNITY INSURANCE COMPANY)	
OF NORTH AMERICA,)	
)	
Third-Party Defendant and)	
Fourth-Party Plaintiff,)	
v.)	
)	
NATIONAL UNION FIRE INSURANCE)	
COMPANY OF PITTSBURGH, PA, and)	
GENERAL STAR INDEMNITY COMPANY,)	
)	
Fourth-Party Defendants.)	

**MOTION FOR SUMMARY JUDGMENT
OF CROSS-CLAIM DEFENDANT NATIONAL UNION
FIRE INSURANCE COMPANY OF PITTSBURGH, PA**

National Union Fire Insurance Company of Pittsburgh, PA (“National Union”), by and through undersigned counsel, hereby files its motion for summary judgment pursuant to Fed. R. Civ. P. 56 (the “Motion”). In support of the Motion, National Union hereby adopts, and incorporates by reference, its opening brief in support of its motion for summary judgment, filed contemporaneously herewith.

Dated: June 25, 2007
Wilmington, Delaware

CROSS & SIMON, LLC

By: /s/ Christopher P. Simon
Christopher Page Simon (No. 3697)
913 N. Market Street, 11th Floor
P.O. Box 1380
Wilmington, Delaware 19801
Telephone: (302) 777-4200
Facsimile: (302) 777-4224

-and-

George C. Campion, Esquire
Weiner Lesniak, LLP
629 Parsippany Road
Parsippany, NJ 07054-0438
Telephone: (973) 403-1100
Facsimile: (973) 403-0010

-and-

Gwynne A. Young
Florida Bar No. 185582
Frederick T. Hawkes
Florida Bar No. 307629
Carlton Fields, PA
P.O. Drawer 190
Tallahassee, FL 32302
Phone: (850) 224-1585
Facsimile: (850) 222-0398

Counsel for Cross-Claim Defendant
National Union Fire Insurance Co. of
Pittsburgh, PA